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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ANIKA OKJE ERDMANN-BROWNING and
JACQUELINE BENITEZ, individually and on
behalf of all others similarly situated,

Plaintiffs,

V.

THOMAS J. VILSACK, Secretary of the United States Department of Agriculture, in his official capacity; SHALANDA YOUNG, Director of the United States Office of Management and Budget, in her official capacity.

Defendants.

Case No.: 4:23-cv-04678-JST

CLASS ACTION

**DECLARATION OF SALAAM BHATTI
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION**

Hearing date: March 14, 2024
Time: 2:00 p.m.

Action filed: September 12, 2023

DECLARATION OF SALAAM BHATTI

I, Salaam Bhatti, declare that the facts set forth in this declaration are based on my firsthand knowledge, and that if called as a witness I could and would competently testify under oath to the following statements.

1. I, Salaam Bhatti, Esq., operate as the SNAP Director at the Food Research & Action Center (FRAC). I have been working in this role at FRAC since November 2023. Previously, I worked at the Virginia Poverty Law Center and focused on the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), and school meal policies where I helped legal aid Programs throughout Virginia and lobbied in the state assembly. Through our collective efforts, we accomplished progress in these programs, including SNAP broad-based categorical eligibility, increases to TANF benefit amounts, and subsidizing reduced-price school meals. I am an expert in SNAP having led a legal services program for over six years specifically on expanding and strengthening SNAP. I am an expert in relationship and coalition building to bring about support for different issues.

2. Since 1970, FRAC has served as the nation's preeminent anti-hunger policy leader by creating and defending successful policies at the federal, state, and local levels that help people struggling against hunger and poverty access the nutrition they need to thrive. FRAC focuses on expanding access and eligibility and improving participation, benefit amounts, and nutrition quality in the federal nutrition programs administered by the U.S. Department of Agriculture (USDA). These include the Supplemental Nutrition Assistance Program (SNAP), the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), school meals, afterschool and summer nutrition, childcare food, and Pandemic/Summer Electronic Benefit Transfer (EBT). As such, FRAC's principal function is the provision of professional advisory, research, and educational services to federal, state, and local agencies, nonprofits, and other stakeholders related to the public management of the federal nutrition programs.

3. FRAC is a leading organization in the United States devoted to advocacy

1 on behalf of beneficiaries of national food programs, particularly SNAP, which is one of
 2 our principal areas of expertise.

3 4. SNAP is our nation's number one defense against hunger and supports the
 4 economy. We have been tracking the hunger cliff caused by the end of the Emergency
 5 Allotments (EAs) have had on food insufficiency. As a result of diminished benefits, over 2
 6 million people have experienced food insufficiency.

7 5. We have closely followed research on this ongoing impact exacerbated by the
 8 end of the flexibilities and have found that SNAP recipients have reported not having the
 9 household essentials they typically need. Recipients also reported being forced to choose
 10 between buying food or paying rent and utility and other bills.

11 6. In these situations, because rent and bills are paid first to prevent eviction and
 12 loss of electricity and water, food budgets are cut which leads to households making difficult
 13 decisions. We know that in households with children, parents will skip meals so that their
 14 children can eat. Studies also show that when food budgets are stretched thin, purchasing
 15 patterns change resulting in fewer produce and meat purchases due to higher price points.
 16 This results in stretching their dollar as much as possible by purchasing lower cost food
 17 items, which tend to be more processed.

18 7. We have followed that Census results show food insufficiency
 19 disproportionately affects Black and Brown families.

20 8. The decrease in SNAP benefits also has impacted grocery retailers.
 21 Economists estimate that grocery retailers are set to lose 20 billion this year in sales due to
 22 the SNAP benefit reduction caused by the end of Emergency Allotments.

23 9. Considering the Hunger Cliff that SNAP recipients have been facing, we know
 24 that any stoppage of benefits will have detrimental consequences to SNAP recipients.

25 10. We are certain a government shutdown will have a negative impactful
 26 outcome as the harm was well documented just four years ago during the last major federal

shutdown.

11. Disrupting these benefits would cause immense harm to the households who rely on the program to eat, overwhelm our partner food assistance agencies, and undermine FRAC's mission to improve the nutrition, health, and well-being of people struggling against poverty-related hunger in the United States.

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 29, 2024, in Richmond, Virginia.

Salam Ghida

SALAAM BHATTI